



March 24, 2008

Re:

U.S. Standards for Grades of Table Grapes (European or Vinifera Type)

Docket # AMS-FV-07-0140

Federal Register, Vol. 73, No. 38, February 26, 2008, pages 10185-10187

As a Retailer that is responsible for the quality we serve and offer our guests in our stores, I must express my opposition to the USDA proposal that would establish a special 5% allowance for shattered table grapes in consumer containers for en route, or at destination. In addition to shatter, this proposal also raises the tolerance level by 5% for other defects, such as scarring and discoloration. I believe the retail segment of the industry is disproportionately impacted by this proposal and it does not yet take into account recent scientific research, indicating shattered table grapes are more susceptible to higher bacterial counts, resulting in reduced shelf life. The Grade of U.S. No.1 will be significantly weakened, not to mention customers will not understand the lowering of standards. In my experience, grapes that naturally detach from the cap stem are past their prime and beginning their slide toward spoilage and decay. We as retailers are duty bound to offer our guests the best competitive and enjoyable experience possible at a competitive retail while also producing a gross margin acceptable to stay in business. Any lowering of standards will only shorten the life of the grape and make the product more susceptible to microbiological contamination. Our industry has always been based on Integrity. We all lose when the grade is weakened and our standards are lowered. I hope this proposal will not be allowed.

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